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### CONTACT INFORMATION INSTRUCTIONS

The purpose of this section is to collect information about your facility's physical location and the person who will serve as your facility's contact person.

If you need further assistance, please contact the Performance Track Information Center at 1-888-339-PTRK or ptrack@indecon.com.

#### NAME OF YOUR FACILITY

First, provide the name of the facility applying for admission. If you are submitting an application for multiple facilities in one corporation, you must call 1-888-339-PTRK. Also, if your company has multiple members in the program (or plans to have multiple members in the future), we suggest that you choose facility names that distinguish one facility from another.

### DOES YOUR FACILITY HAVE A PARENT COMPANY?

If your facility is owned by another company, is a division of a larger company, or is the responsibility of another company, answer "Yes" here and provide the name of that company in the text box. If it is important that your parent company name appear in all Performance Track documentation, please include it in the Facility Name field above in addition to entering it here.

#### **FACILITY LOCATION**

In the Facility Location section, provide the physical location of the facility applying for membership. Please list all addresses of sites/buildings considered part of your facility.

#### **FACILITY MAILING ADDRESS**

You may use this section to provide an alternate mailing address for the facility.

#### CONTACT INFORMATION

In the Contact Information section, provide information for the individual who should be contacted for additional information about your facility's application. If applicable, provide your facility's website.

#### SECTION A INSTRUCTIONS

In this section, please provide some basic information about your facility. If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or ptrack@indecon.com.

### In this section:

1. What ways have you learned about Performance Track?	2-1
2. Describe your facility's operations.	2-1
3. List the North American Industrial Classification System (NAICS) codes that you use to classify business at your facility	2-1
4. How many employees (full-time equivalents) currently work at your facility?	2-1
5. Optional: Is there anything else you would like to tell us about your facility? Do you participate in other voluntary programs at the local, tribal, state, or federal level? Have you received any environmental	
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6. Optional: Is your facility a member of a state voluntary environmental	
leadership program?	2-2

# 1. WHAT WAYS HAVE YOU LEARNED ABOUT PERFORMANCE TRACK?

Please select all the ways that you learned about Performance Track. This helps us to be more efficient in our program outreach.

#### 2. DESCRIBE YOUR FACILITY'S OPERATIONS.

Briefly describe the primary products that you manufacture, prepare, or assemble at your facility. For non-manufacturing facilities, describe the services you provide or activities you conduct.

# 3. LIST THE NORTH AMERICAN INDUSTRIAL CLASSIFICATION SYSTEM (NAICS) CODES THAT YOU USE TO CLASSIFY BUSINESS AT YOUR FACILITY.

If your facility has more than one NAICS code, please list the primary code for the facility first, followed by all other codes. If you do not know your facility's classification code, please consult the following website: <a href="http://www.census.gov/epcd/www/naicstab.htm">http://www.census.gov/epcd/www/naicstab.htm</a>.

# 4. HOW MANY EMPLOYEES (FULL-TIME EQUIVALENTS) CURRENTLY WORK AT YOUR FACILITY?

Select the option that best corresponds to the number of full-time equivalent (FTE) employees working at the facility. An FTE represents 2,000 hours per year. To calculate the number of FTEs, add the total hours worked during the calendar year by all employees, including part-time and seasonal employees, and divide the total by 2,000. The answer is your FTE.

# 5. OPTIONAL: IS THERE ANYTHING ELSE YOU WOULD LIKE TO TELL US ABOUT YOUR FACILITY? DO YOU PARTICIPATE IN OTHER VOLUNTARY PROGRAMS AT THE LOCAL, TRIBAL, STATE, OR FEDERAL LEVEL? HAVE YOU RECEIVED ANY ENVIRONMENTAL AWARDS?

This question is optional. Use this space to share other information about your facility's environmental accomplishments and activities that you believe would be useful to other facilities and could assist us in highlighting the achievements of Performance Track members. This information will be used to develop a web profile of your facility should you be admitted to Performance Track. You may attach additional files.

# 6. OPTIONAL: IS YOUR FACILITY A MEMBER OF A STATE VOLUNTARY ENVIRONMENTAL LEADERSHIP PROGRAM?

The National Environmental Performance Track is working with states to coordinate the implementation of Performance Track and state environmental leadership programs. In addition, we continue to work together to identify ways to streamline and facilitate our program application and reporting processes. If you are a member of a state voluntary environmental leadership program, select "Yes" and list the name of the program. If you are not a member of a program, and your facility is located in Colorado, Georgia, Texas, Utah, or Virginia then you can apply simultaneously to both Performance Track and your state's program through the Performance Track Application. Click on one of the links listed to learn more about your state's program, and select "Yes" to apply to both or "No" if you prefer to apply only to Performance Track. Please note that the state programs may have additional membership criteria and/or request supplementary information.

### **SECTION B INSTRUCTIONS**

In this section tell us about the environmental management system (EMS) that your facility has in place. We need to know about your EMS because it represents your facility's systematic efforts to meet environmental requirements and improve environmental performance. You must be able to answer "Yes" to questions 2-4 and 6-8 in order to qualify for Performance Track.

An EMS includes, but also goes beyond, managing for compliance with regulations. An EMS includes an analysis of aspects, which are those parts of a facility's activities, products, or services that can have an environmental impact. Aspects include both regulated and unregulated activities and impacts. An EMS should use a consistent, objective method for determining which of the aspects are "significant." This method may consider environmental risk, regulatory requirements, community concerns, opportunities for pollution prevention, and other factors. An EMS should include measurable objectives and targets for maintaining compliance with environmental requirements, for reducing risk from significant environmental aspects, and for advancing other priorities contained in your facility's environmental policy.

If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or <a href="mailto:ptrack@indecon.com">ptrack@indecon.com</a>.

### In this section:

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Planning	3-3
Implementing and Operation	3-3
Checking and Corrective Action	3-4
Management Review	3-4
3. Have you done a comprehensive review of all activities conducted at your facility that could impact the environment (i.e., have you done an aspect analysis)?	3-4
4. Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors (i.e., have you determined your significant aspects)?	3-5
5. When did you last update your aspect analysis? (mo/yr)	3-5
6. Have you completed at least one EMS cycle (plan-do-check-act)?	3-5
7. Did this cycle include both an EMS and a compliance audit?	3-5
8. Have you completed an independent assessment of your EMS in conformance with the Performance Track Independent Assessment	
Criterion?	3-6
9. What was the date of your last independent EMS assessment? (mo/yr)	3-6

#### 1. ARE YOU A RESPONSIBLE CARE CERTIFIED FACILITY?

Select "Yes" if your facility is a certified member of the Responsible Care program. Responsible Care is a voluntary program of the American Chemistry Council; the program's goals are to achieve improvements in environmental, health, and safety performance beyond levels required by the U.S. government. The National Environmental Performance Track has an agreement with the Responsible Care Program to work together to promote better environmental performance and measurement. In addition, Performance Track realizes that Responsible Care members meet Performance Track criteria for independent EMS assessment. For more information on Responsible Care visit: <a href="http://www.americanchemistry.com/">http://www.americanchemistry.com/</a>.

If yes, please answer the supplementary questions regarding your Responsible Care certification:

Please indicate, by selecting of the radio buttons, whether your certification is to RC EMS or RC 14001.

Select the appropriate radio button to indicate whether you are a member of American Chemistry Council (ACC).

Select the appropriate radio button to indicate whether you are a member of the Synthetic Organic Chemical Manufacturers Association (SOCMA).

Responsible Care certified facilities do not need to complete the rest of the information in Section B as the fact that they are certified provides answers to these questions.

If no, please complete the remaining questions.

#### 2. COMPONENTS OF THE EMS

Because we believe that your EMS is critical to maintaining and improving your environmental performance, we strongly recommend that you review the questions in the EMS Worksheet about your EMS before answering Question 2. If your EMS has been certified to ISO 14001, you should skip this worksheet and answer "Yes" to all elements of question 2.

## **EMS** Worksheet

#### **Environmental Policy**

- Does your EMS include a written environmental policy that has been defined by top facility management?
- Does your policy commit your facility to compliance with both your legal requirements and your voluntary commitments? OR Do you have programs and procedures in place that achieve compliance with both your legal requirements and your voluntary commitments?
- Does your policy commit your facility to preventing pollution at its source wherever possible?
- Does your policy commit your facility to continuously improve your environmental performance, even in areas where you do not have regulatory requirements?

Does your policy commit your facility to sharing information with your community about your environmental performance and about how your EMS operates? Or, do you have programs and procedures in place that implement your commitment to share information with your community about your environmental performance?

If you can answer "Yes" to all of the questions in this section, then select "Yes" to Environmental Policy. Otherwise, select "No."

### **Planning**

- Have you conducted an analysis of all your facility's aspects, both regulated and unregulated?
- Have you determined which aspects are significant?
- Does your EMS include an inventory of all your legal requirements at the federal, state, tribal, or local level?
- Does your EMS include procedures for integrating changes to your legal requirements or voluntary commitments into the EMS?
- Does your EMS include measurable objectives and targets and active, documented programs to meet your policy commitments?

If you can answer "Yes" to all of the questions in this section, then select "Yes" to Planning. Otherwise, select "No."

## Implementing and Operation

- Is there top management commitment to your EMS (e.g., a top manager with responsibility and authority for implementing your EMS)?
- Does your EMS establish roles and responsibilities for meeting the objectives and targets of the EMS, including compliance with legal requirements?
- Does your EMS establish procedures for achieving and maintaining compliance with legal requirements and meeting performance objectives?
- Does your EMS establish procedures for communicating EMS information throughout your organization, including information about your facility's environmental performance?
- Does your EMS hold managers and employees accountable for meeting EMS requirements?
- Does your EMS establish procedures for controlling EMS documents that include who will maintain the documents and where they will be stored?
- Does your EMS include a general environmental training program for all employees?
- Does your EMS include specific training for those who have direct responsibility for achieving legal compliance or the objectives and targets in the EMS?
- Does your EMS document all of the following:
  - Your environmental policy?
  - Your significant environmental impacts?
  - Your objectives and targets?

- The manager in charge of the EMS?
- Your compliance audit program?
- Your EMS audit program?
- Overall authority for the EMS?
- Does your EMS include operation and maintenance programs for equipment and other activities that are related to legal compliance and achieving the objectives and targets in the EMS?
- Does your EMS include an emergency-preparedness program?

If you can answer "Yes" to all of the questions in this section, then select "Yes" to Implementation and Operation. Otherwise, select "No."

#### Checking and Corrective Action

- Does your EMS include an ongoing program for assessing facility performance and for preventing and detecting nonconformance with your EMS?
- Do you have an EMS audit program?
- Does your EMS include an ongoing program for preventing and detecting noncompliance with legal requirements?
- Does your EMS include a compliance audit program?
- Does your EMS include an active program for prompt corrective action of noncompliance with legal requirements and of nonconformance with EMS requirements?

If you can answer "Yes" to all of the questions in this section, then select "Yes" to Checking and Corrective Action. Otherwise, check "No."

# Management Review

If you have a documented management review of the performance and the effectiveness of your EMS in meeting the EMS policy commitments, then select "Yes" to question 5. Otherwise, select "No."

# 3. HAVE YOU DONE A COMPREHENSIVE REVIEW OF ALL ACTIVITIES CONDUCTED AT YOUR FACILITY THAT COULD IMPACT THE ENVIRONMENT (I.E., HAVE YOU DONE AN ASPECT ANALYSIS)?

An aspect is any part of a facility's activities, products, or services that could have an impact on the environment. An aspect analysis includes both regulated and unregulated activities and products and their associated impacts. If you have done a complete inventory of all your facility's operations and determined the activities that could have an impact on the environment, select "Yes" to this question. Otherwise, select "No."

Examples of activities and aspects are:

ASPECTS
Hazardous material use (toxic solvents)
Emissions of VOCs, Emissions of air toxics
Emissions of greenhouse gases, VOCs, NOx
Energy use

# 4. HAVE YOU CLASSIFIED YOUR ASPECTS BASED ON THEIR POTENTIAL HARM TO THE ENVIRONMENT, ON COMMUNITY CONCERNS, AND/OR ON OTHER OBJECTIVE FACTORS (I.E., HAVE YOU DETERMINED YOUR SIGNIFICANT ASPECTS)?

Some of your aspects should be classified as "significant" because they have the greatest potential to cause a significant environmental impact. Your EMS should include a consistent method for determining which of the aspects are significant. In addition to environmental risk, this method may consider other factors such as regulatory requirements, community concerns, or opportunities for pollution prevention. If you have identified and documented your significant environmental aspects, select "Yes." Otherwise, select "No."

## 5. WHEN DID YOU LAST UPDATE YOUR ASPECT ANALYSIS? (MO/YR)

As part of your EMS implementation cycle, your aspect analysis should be reviewed and updated to insure that it continues to accurately reflect your facility's activities. Please select the date (mo/yr) that you last updated your aspect analysis.

# 6. HAVE YOU COMPLETED AT LEAST ONE EMS CYCLE (PLAN-DO-CHECK-ACT)?

A complete cycle includes:

- Defining and documenting your EMS;
- Identifying significant aspects and legal requirements;
- Setting measurable objectives and targets;
- Establishing roles and responsibilities for meeting EMS and legal requirements;
- Conducting training for personnel on EMS and legal requirements;
- Taking steps to meet the established objectives and targets;
- Evaluating your progress in meeting the established objectives and targets;
- Conducting an EMS audit;
- Completing a compliance audit;
- Correcting any areas of EMS non-compliance or legal non-compliance; and
- Completing a management review of the EMS and its results.

If you have completed all of these activities, select "Yes." If not, select "No."

## 7. DID THIS CYCLE INCLUDE BOTH AN EMS AND A COMPLIANCE AUDIT?

Select "Yes" if you have completed an internal audit of the EMS and an internal audit of compliance with applicable federal, state, tribal and local environmental requirements. This

question does not refer to inspections by government agencies or to independent or external audits of your EMS or compliance. Otherwise, select "No."

# 8. HAVE YOU COMPLETED AN INDEPENDENT ASSESSMENT OF YOUR EMS IN CONFORMANCE WITH THE PERFORMANCE TRACK INDEPENDENT ASSESSMENT CRITERION?

All facilities applying to the program must have had an independent assessment of their EMS within the two-year period preceding their application. Guidelines for these assessments are set out in the Independent EMS Assessment Criterion. An independent assessment is one that is performed by someone who is neither directly employed by your facility nor someone who has played a substantive role in developing your EMS. The assessment must be performed using a protocol that covers all of the Performance Track EMS elements, which are covered in the checklist above for questions 1 through 5.

The lead auditor for your assessment must have certain qualifications as set out in the Independent EMS Assessment Criterion. In addition, EPA has developed an Independent Assessment Protocol that facilities may use as a stand-alone audit protocol or as a supplement to an existing audit protocol. The Independent EMS Assessment Criterion sets out a number of options for how a facility may obtain an independent assessment. For example, a corporate audit meeting the above criteria would qualify as an independent assessment.

The qualifications for individuals conducting independent assessments are consistent with those established by the Registrar Accreditation Board and the Board of Environmental, Health, & Safety Auditor Certifications for ISO 14001 lead auditors. In addition, the ISO 14001:1996 EMS specification covers all of the major Performance Track EMS elements except the requirement for sharing information with your community about your environmental performance (in the checklist under question 1). If you are certified to ISO 14001 and have made a commitment to, and have programs for, sharing information with your community about your environmental performance, then you have met this requirement for an independent assessment of your EMS.

If you have had an independent assessment of your EMS that meets these criteria, select "Yes." Otherwise, select "No." Then select the method of EMS assessment. If you are certified to ISO 14001, select "ISO 14001." If you used the Performance Track Independent Assessment Protocol, select that option. Otherwise, select "Other" and specify the type of assessment used (the assessment still must cover all of the NEPT EMS criteria).

#### 9. WHAT WAS THE DATE OF YOUR LAST INDEPENDENT EMS ASSESSMENT? (MO/YR)

Select the month and year of your last independent EMS assessment. This date must be within the past 24 months in order for you to qualify for Performance Track.

# 10. WHO PERFORMED THE INDEPENDENT ASSESSMENT?

Enter the name, title, and company affiliation of the lead auditor for your independent assessment.

#### SECTION C: PAST ACHIEVEMENTS INSTRUCTIONS

In this section, we need you to demonstrate your facility's past achievements. Your past achievements must be expressed in terms of quantitative improvements in indicators included in the Environmental Performance Table. The Environmental Performance Table includes a broad range of environmental impacts. Not all of these environmental impacts will be relevant to your facility. In the Table, we've captured the general types of environmental impacts as "categories" and then broken them down into more specific impacts we call "indicators." These "indicators" are quantified by the units in the right-hand column.

It is important to remember that some indicators are currently regulated and some are not. If you choose an indicator that is regulated, you must commit to performance goals that go beyond the federal, state, tribal, and local regulatory requirements.

To demonstrate past achievements, you will select two different environmental indicators from any of the categories in the Environmental Performance Table. Then, complete the Achievement tables to report performance on those indicators. If you are a small facility, you can choose to complete only the table for the first indicator.

If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or ptrack@indecon.com.

# In this section:

1a. and 1b. Category and Indicator	4-1
1c. Please provide additional detail on your indicator (e.g., specific chemical reduced, specific waste component)	4-2
1d. What activities or process changes did you undertake to accomplish this achievement?	4-2
2a. Reporting Years	4-2
2b. List the past annual quantity of the indicator, and the current annual quantity of the indicator.	4-2
2c. What units are you using to quantify this indicator?	4-2
2d. Estimate your past normalizing factor.	4-2
2e. What is your past normalizing factor based on?	4-3
2f. Normalized Quantities	4-3

#### 1A. AND 1B. CATEGORY AND INDICATOR

Select the category and indicator from the drop-down menu.

# 1C. PLEASE PROVIDE ADDITIONAL DETAIL ON YOUR INDICATOR (E.G., SPECIFIC CHEMICAL REDUCED, SPECIFIC WASTE COMPONENT).

If your achievement is more specific than the indicator, please provide a precise description. For example, if your achievement was reducing emissions of methane, and you chose the indicator "VOCs," please enter "methane" here.

# 1D. WHAT ACTIVITIES OR PROCESS CHANGES DID YOU UNDERTAKE TO ACCOMPLISH THIS ACHIEVEMENT?

We'd like to know how you achieved this improvement. Information you might include is: process changes, equipment, product redesigns, shutting off equipment when not in use, etc.

#### 2A. REPORTING YEARS

We have pre-filled the calendar years for which you should measure baseline and project future quantities of your indicator.

# 2B. LIST THE PAST ANNUAL QUANTITY OF THE INDICATOR, AND THE CURRENT ANNUAL QUANTITY OF THE INDICATOR

For the "Past" annual quantity, please enter quantity of the indicator for the calendar year listed on your application form in the left column. For the "Current" quantity, enter the quantity of the indicator for the calendar year listed on your application form in the right column.

#### 2C. WHAT UNITS ARE YOU USING TO QUANTIFY THIS INDICATOR?

Select the units from the drop-down menu. You must use the units in the drop-down menu.

# 2D. ESTIMATE YOUR PAST NORMALIZING FACTOR.

Environmental performance can be measured by the actual amount of environmental impacts (the "environmental footprint", or by the environmental impact relative to economic activity (also called "eco-efficiency.") A complete picture of a facility's environmental progress should include both measurements.

A normalizing factor will allow this conversion between the actual and relative impacts, while protecting the confidentiality of production levels, product content, or other sensitive information. The best normalizing factors are direct measures of production, for example, number of cars produced, kWh of electricity generated, dollars of sales adjusted for inflation. Depending on the facility, "production" may instead refer to services delivered or to some other productive output from the facility. Research, service, and governmental facilities may find it more difficult to determine their normalizing factors, and instead may have to rely on substitute measures of production, such as employment.

A simple normalizing factor for your past year's data would be the production in the past year divided by production in the current year. If your facility or company has developed a production index that weighs heterogeneous types of products according to size, complexity, or other factors, you may use that as your normalizing factor. Please provide a brief description of the index. It is not necessary to provide the exact equation, but please do list or describe the types of factors included.

If you need help determining the basis for your normalizing factor, please see the <u>Performance Track normalizing guidance</u>.

# Performance Track A Program for Top Environmental Performers

# 2E. WHAT IS YOUR PAST NORMALIZING FACTOR BASED ON?

Please type in the basis for the normalizing factor you reported in 2d.

# **2F. NORMALIZED QUANTITIES**

These are automatically generated after you enter the actual quantities and normalizing factor.

# SECTION C: ENVIRONMENTAL PERFORMANCE COMMITMENTS SELECTION INSTRUCTIONS

In this section, please select your facility's new environmental performance commitments. You may select up to six commitments, but should select no more than two commitments in any one category. Small facilities, those with less than 50 employees, must make at least two commitments. All other facilities must commit to at least four unless committing to a Challenge Commitment. If a facility makes a Challenge Commitment, then it receives "two-for-one" credit for the Challenge Commitment, so it only needs to make three total commitments (more information on Challenge Commitments is provided in help text associated with general and detailed commitments). Small facilities are welcome to make Challenge Commitments but they still must make two total commitments.

Performance Track does not give credit to applicants and members to make goals to environmental indicators that would improve automatically as a result of core business expansion. They must demonstrate process improvements for it to count as a Performance Track goal. Examples include: a facility that recycles electronics cannot commit to take back more electronics for recycling; a MSW recycling center cannot commit to increase the volume of MSW recycled; and a utility that generates electricity from one relatively clean source cannot commit to generate more electricity from that same source.

# Membership Commitments Introduction

On this page, you will select a category and indicator from the drop down menu for each future commitment. Click on the green "Add" button to add the commitments. You can enter specifics about your commitment by clicking the "Edit" link to the right of the commitment or by clicking the "Next" button in the menu bar. You may also delete and define a new commitment by clicking the "Delete" link next to a specific commitment in the table and clicking "OK" when prompted. Please note that by deleting a commitment, you will delete all information you may have entered in the associated commitment table.

# COMMITMENTS TO REDUCE TOTAL (NON-TRANSPORTATION) ENERGY USE

# **Indicator Definition**

CATEGORY: ENERGY USE

#### INDICATOR: TOTAL (NON-TRANSPORTATION) ENERGY USE

The total (non-transportation) energy use commitment covers facility energy use from all energy sources, except fuels for transportation-related energy use. The form allows facilities to commit to either reducing total energy use or to increasing renewable fuel use. It also allows facilities to commit to purchases of electricity from renewable sources. Regardless of which kind of energy commitment you make, you will need to report your energy use broken down by source and fuel type.

Information on energy sources that you provide on the application will allow the automated form to convert your energy use into to greenhouse gas equivalents. You can use the greenhouse gas equivalents when participating in emerging greenhouse gas protocols, registries, and trading schemes, including those developed by EPA's Climate Leaders program, the World Resources Institute/World Business Council for Sustainable Development, and the U.S. Department of Energy. Performance Track will use the greenhouse gas reduction results when we report on the overall results of the Performance Track program.

IMPORTANT: Do not include transportation-related fuel use in this table. Commitments to reduce transportation energy use should be reported separately under the indicator heading 'Transportation Energy Use.' Transportation-related fuel use includes both on-site and offsite energy use by any vehicles or mobile machinery (i.e., anything that moves and uses energy), including fleet vehicles, employees' vehicles, aircraft, marine vessels, locomotives, recreational vehicles, construction equipment, industrial equipment, golf carts, lawn and garden equipment, farm equipment, commercial equipment, logging equipment, and airport service equipment and vehicles. Environmental management activities aimed at reducing air emissions resulting from combustion (VOCs, NOx, CO, and PM10) are better reported under the appropriate indicator in the Air Emissions category.

**Units:** Standard indicators to use for energy use include MMBtu and Btu, and kWh or MWh for electricity.

# Section C Instructions

If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or <a href="mailto:ptrack@indecon.com">ptrack@indecon.com</a>.

# In this section:

1a.	d 1b. Category and Indicator	6-2
1c.	ease provide additional detail on your indicator	6-2

1d. What activities or process changes do you plan to undertake at your	
facility to accomplish your commitment?	6-2
2. Are you proposing this as a challenge commitment?	6-2
3a. and 3b. Does this commitment address a significant aspect in your	
EMS?	6-3
4a. Goal of Total (non-transportation) Energy Use commitment	6-3
4b. Reporting Years	6-4
4c. Energy Generated Off-Site	6-4
4d. Energy Generated On-Site.	6-4
4e. Total Energy Use and Associated Greenhouse Gas Emissions	6-5
5. Does the quantity presented in the future quantity column represent an	
absolute goal or a normalized goal?	6-5
6. Please briefly describe your intended basis for normalizing	6-5
7a. and 7b. Are you subject to federal, state, tribal, or local regulatory	
requirements for this indicator?	6-6

#### 1A. AND 1B. CATEGORY AND INDICATOR

These sections display the category and indicator you selected on the Membership Commitments Introduction page. In order to change this commitment, you must return to the main Membership Commitments Introduction page by clicking the "Sect.C Future" link at the top of the page. You may then delete this commitment by clicking the "delete" link adjacent to the entry for this commitment and add a new commitment in its place.

# 1C. PLEASE PROVIDE ADDITIONAL DETAIL ON YOUR INDICATOR.

As noted in the Environmental Performance Table, for some indicators you have the choice of reporting on a specific subset of an indicator (e.g., one specific material or a particular group of air toxics). For commitments to Total (non-transportation) Energy Use, however, you must report on all non-transportation energy use at the facility. Therefore, "All" has already been selected for you.

# 1D. WHAT ACTIVITIES OR PROCESS CHANGES DO YOU PLAN TO UNDERTAKE AT YOUR FACILITY TO ACCOMPLISH YOUR COMMITMENT?

Describe the actions you will take to meet this commitment. You might include information like: process changes, equipment upgrades, product redesign, or shutting off equipment while not in use. This information might be used by other facilities looking for ideas on improving their own performance, so please provide a good summary of how you are going to accomplish your goal without going into an enormous amount of detail. A short paragraph should be sufficient.

#### 2. ARE YOU PROPOSING THIS AS A CHALLENGE COMMITMENT?

EPA has selected one or more high priority environmental concerns in each EPA Region as the subject of a "Challenge Commitment." In order to encourage Performance Track members to make progress on these high priority environmental issues, a facility that makes a Challenge Commitment that meets EPA's requirements can get "two-for-one" credit, i.e., the facility can

choose to make only two additional commitments, rather than three. However, a small facility that makes a Challenge Commitment would still have to make one additional commitment. For more details, please read EPA's <u>Challenge Commitment Policy for the National Environmental Performance Track Program</u> (PDF, 39 KB, 3 pp.).

Note that not all commitments can be considered Challenge Commitments. If the type of commitment you selected is not eligible to be a Challenge Commitment, the response to question 2 will be marked as "No," and it will not be possible to edit that response. If the type of commitment you selected is eligible to be a Challenge Commitment, click on the link "Learn more about Challenge Commitments" under question 2 to see what criteria your facility would need to meet in order to make a Challenge Commitment.

If you would like to know the types of commitments that could potentially be used as Challenge Commitments, you must first identify the EPA Region in which your facility is located. To find out your EPA Region, see the EPA Regional map. Then, to find out which Challenge Commitments are available in your Region, click on the link to your Region below. If the commitment you are making meets the requirements for a Challenge Commitment as described in the links below, answer "Yes" to question 2 on the Renewal form.

<b>-</b>	-
Region	1

Region 2

Region 3

Region 4

Region 5

Region 6

Region 7

Region 8

Region 9

Region 10

If your facility is eligible to make a Total Energy Use Challenge Commitment, you should be able to select "Yes" in response to question 2 on your renewal. Click on the link "Learn more about Challenge Commitments" under question 2 to see what criteria your facility would need to meet in order to make a Challenge Commitment. If the commitment you are making meets the requirements for a Challenge Commitment, answer "Yes" to question 2.

#### 3A. AND 3B. DOES THIS COMMITMENT ADDRESS A SIGNIFICANT ASPECT IN YOUR EMS?

During the planning phase of your EMS, you should have designated some of your environmental aspects as "significant." If this commitment addresses one of those significant aspects, check "Yes." Otherwise, check "No."

If you answered "No" in part a, under part b please explain why you believe the selected indicator should be included as a performance commitment. Significant aspects are usually those that pose the highest environmental risk, or are of particular local concern. In general, we expect Performance Track facilities to be working on these priorities first. If your commitment does not address a significant aspect, please explain why you think it is important.

# 4A. GOAL OF TOTAL (NON-TRANSPORTATION) ENERGY USE COMMITMENT

In the drop-down menu, please select whether your commitment is to Reduce Total Energy Use, Invest in Renewable Energy Sources, or a Combination of Both Strategies.

#### 4B. REPORTING YEARS

Performance Track has pre-filled the calendar years for which you should measure baseline and project future quantities of your indicator.

#### 4C. ENERGY GENERATED OFF-SITE

Complete the first part of the table, "Energy Generated Off-Site" by filling in quantities for energy that you purchase as electricity or steam. You must select one of the units provided in the pull-down menu in the far right column. Fill in the amount of energy you purchased during the "Baseline" calendar year in the "Baseline" column. Fill in the amount you are committing to purchase during the "Future" calendar year in the "Future" column.

If your facility uses electricity, fill in the amount of energy that is purchased from a utility as well as any amount that is derived from "off-grid renewable" sources (e.g., electricity that is produced by a nearby wind farm that is provided separately from the local utility). In many cases, all of the electricity used by a facility is purchased from a utility. In this case, enter the total amount of electricity used in the row for electricity purchased from a utility, and enter zero in the row for off-grid electricity sources.

Please identify your facility's EGRID geographic region, which is based on your facility's location and electricity provider. The geographic region identification will allow the form to accurately calculate the emissions associated with your facility's electricity purchases. To identify your facility's geographic region, click on the link entitled "Need help identifying the geographic region?" or contact the Performance Track Information Center at 1-888-339-PTRK or ptrack@indecon.com.

If your facility purchases or obtains steam off-site, enter the total amount of steam used in the appropriate row. Note that EPA will be contacting you to determine the source of the steam used, so that the appropriate greenhouse gas emissions factor can be used.

Do not include any electricity or steam that you generate; the fuel used to generate this energy can be reported in the second part of the table.

### Purchases of Electricity from Renewable Off-Site Sources

If you are committing to purchase electricity produced off-site from renewable sources, you will need to calculate the metric tons of carbon dioxide (CO<sub>2</sub>) equivalent that will be offset by this purchase. The number of metric tons of CO<sub>2</sub> equivalent offset per kWh will vary among electricity providers. Please contact your electricity provider for this information or the Performance Track Information Center at 1-888-339-PTRK or <a href="mailto:ptrack@indecon.com">ptrack@indecon.com</a> for help with this calculation.

#### **4D. ENERGY GENERATED ON-SITE**

Complete the second part of the table, "Sources of Energy Generated On-Site" by filling in the amounts of each fuel or energy source you used in the Baseline year and the amounts you are committing to use in your Future year. You must select one of the units provided in the far right column for each source.

This section of the table is designed to allow you to report on the fuel that you use at your facility. Thus, if you generate electricity or steam on-site, you should report the quantity of fuels that you

use, but not the quantity of electricity or steam generated. If you purchase natural gas to produce electricity on-site, you should report the quantity of natural gas your facility uses but not the quantity of electricity that you generate. Similarly, if you co-generate electricity and steam from natural gas, you should report the quantity of natural gas your facility uses but not the quantities of electricity and steam that you generate.

# 4E. TOTAL ENERGY USE AND ASSOCIATED GREENHOUSE GAS EMISSIONS

Based on the data you entered in 4c. Energy Generated Off-Site and 4d. Energy Generated On-Site, your overall energy use and emissions will be calculated for you and appear in this table. All data here is calculated, with the exception of "Metric Tons of CO<sub>2</sub> Equivalents Offset." Enter any green tag purchases here, using units of metric tons of carbon dioxide equivalents (MTCO<sub>2</sub>Es).

# Calculating Total Energy Use and Emissions

Once you have entered all of your energy use information, prompt the form to calculate your totals by either saving your work or hitting the "Calculate Total(s)" button. (Note that you can save your work at any time while you are filling in your data, to prevent losing information, but be sure to recalculate totals when you have completely finished.) Also ensure that you have entered units wherever appropriate or the form will not calculate correctly.

The table will automatically calculate Total Energy Generated Off-Site, Total Energy Generated On-Site, and Total Energy Use by summing the quantities of energy and fuel you report in the table. The form will also calculate the Total Renewable Energy Use and Total Non-Renewable Energy Use based on the amounts and sources of energy you specified. For example, hydropower and solar power are characterized as renewable energy sources, while coal and natural gas are considered non-renewable.

Using CO<sub>2</sub> equivalent emissions factors, the form will calculate the metric tons of CO<sub>2</sub> equivalents (MTCO<sub>2</sub>E) generated from your use of each fuel source. An average emissions factor for each energy source is used to calculate the MTCO<sub>2</sub>E generated. The form then calculates the total metric tons of CO<sub>2</sub> Equivalents and net metric tons of CO<sub>2</sub> Equivalents (total minus offsets). For more detail on the specific calculations and emissions factors, contact the Performance Track Information Center at 1-888-339-PTRK or <a href="mailto:ptrack@indecon.com">ptrack@indecon.com</a>.

# 5. DOES THE QUANTITY PRESENTED IN THE FUTURE QUANTITY COLUMN REPRESENT AN ABSOLUTE GOAL OR A NORMALIZED GOAL?

If the numerical goal that you entered in 4c is the absolute level that you intend to achieve, regardless of any changes in production, then you should check "Absolute Goal." If you intend for your goal to be evaluated relative (indexed) to the production levels in your baseline year, then you should check "Normalized Goal." (Most member facilities have normalized goals.) Note that Challenge Commitments to reduce Total (non-transportation) Energy Use must be absolute goals.

#### 6. PLEASE BRIEFLY DESCRIBE YOUR INTENDED BASIS FOR NORMALIZING.

Environmental performance can be measured by the actual amount of environmental impacts (the "environmental footprint"), or by the environmental impact relative to economic activity (also called "eco-efficiency"). A complete picture of a facility's environmental progress should include

both measurements. Regardless of whether you have decided to commit to an actual goal or to a normalized goal, in your Annual Performance Reports you will be asked to report your progress in both actual and normalized terms.

A normalizing factor will allow this conversion between the actual and relative impacts, while protecting the confidentiality of production levels, product content, or other sensitive information. The best normalizing factors are direct measures of production, for example, number of cars produced, kWh of electricity generated, dollars of sales adjusted for inflation. Depending on the facility, "production" may instead refer to services delivered or to some other productive output from the facility. Research, service, and governmental facilities may find it more difficult to determine their normalizing factors, and instead may have to rely on substitute measures of production, such as employment. If you need help determining the basis for your normalizing factor, please click on the "Normalizing Help Summary" link or refer to the Performance Track normalizing guidance.

If your facility or company has developed a production index that weighs heterogeneous types of products according to size, complexity, or other factors, you may use that as your normalizing factor. Please provide a brief description of the index. It is not necessary to provide the exact equation, but please do list or describe the types of factors included.

# 7A. AND 7B. ARE YOU SUBJECT TO FEDERAL, STATE, TRIBAL, OR LOCAL REGULATORY REQUIREMENTS FOR THIS INDICATOR?

If you have any regulatory requirements related to this indicator—even if they do not directly address quantitative limits—check "Yes." Otherwise, check "No."

If you answered "Yes" under 7a, please list those requirements, including the quantitative limits and compliance deadlines that apply to you in part 7b. Please also explain how your commitment exceeds these requirements. Performance Track needs this information to make sure that your commitment goes beyond compliance. Type in the regulation(s), compliance schedules, and quantitative limits that relate to the indicator. If the units used in the regulation are not the same as the units used in your commitment—for example, if the regulation states concentrations rather than mass—then explain how your commitment goes beyond the regulation. If the regulation does not address quantitative limits, state that here.

#### COMMITMENTS TO REDUCE TRANSPORTATION ENERGY USE

# **Indicator Definition**

CATEGORY: ENERGY USE

#### INDICATOR: TRANSPORTATION ENERGY USE

Commitments to the Transportation Energy Use indicator involve the reduction of mobile air emissions related to a facility's operations.

Required reporting elements for the indicator include: all energy use by mobile sources, including fleet vehicles, aircraft, marine vessels, locomotives, recreational vehicles, construction equipment, industrial equipment, lawn and garden equipment, farm equipment, commercial equipment, logging equipment, and airport service equipment and vehicles. Optional reporting elements include: energy use from employee travel, commuting, upstream or downstream transportation, or off-site waste disposal. If none of the required reporting elements are applicable to your facility, you may propose a commitment to address employee commuting only (an optional element).

Your transportation energy use commitment may be to reduce total transportation energy use, increase use of renewable fuels, or a combination of both. Reporting must be facility-wide.

**Units:** Acceptable units for transportation energy use commitments are gallons (for liquid fuels), cubic feet (for gases), and kilowatt-hours (for electrically-powered vehicles and machinery).

# Section C Instructions

If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or ptrack@indecon.com.

# In this section:

1a. and 1b. Category and Indicator	7-2
1c. Please provide additional detail on your indicator	7-2
1d. What activities or process changes do you plan to undertake at your facility to accomplish your commitment?	7-2
2. Are you proposing this as a challenge commitment?	7-2
3a. and 3b. Does this commitment address a significant aspect in your EMS?	7-3
Goal of Transportation Energy Use commitment	7-3
4a. Reporting Years	7-3
4b. Required reporting, by fuel type	7-3
4c. Optional reporting, by category and fuel type	7-4

5. Does the quantity presented in the future quantity column represent an	
absolute goal or a normalized goal?	7-4
6. Please briefly describe your intended basis for normalizing	7-4
7a. and 7b. Are you subject to federal, state, tribal, or local regulatory	
requirements for this indicator?	7-5

### 1A. AND 1B. CATEGORY AND INDICATOR

These sections display the category and indicator you selected on the Membership Commitments Introduction page. In order to change this commitment, you must return to the main Membership Commitments Introduction page by clicking the "Sect.C Future" link at the top of the page. You may then delete this commitment by clicking the "delete" link adjacent to the entry for this commitment and add a new commitment in its place.

### 1C. PLEASE PROVIDE ADDITIONAL DETAIL ON YOUR INDICATOR.

As noted in the <u>Environmental Performance Table</u>, for some indicators you have the choice of reporting on a specific subset of an indicator (e.g., one specific material or a particular group of air toxics). For commitments to Transportation Energy Use, however, you must report on all transportation energy use at the facility. Therefore, "All" has already been selected for you.

# 1D. WHAT ACTIVITIES OR PROCESS CHANGES DO YOU PLAN TO UNDERTAKE AT YOUR FACILITY TO ACCOMPLISH YOUR COMMITMENT?

Describe the actions you will take to meet this commitment. You might include information like: process changes, fleet conversion or replacement, carpooling incentives, or shutting off equipment while not in use. This information might be used by other facilities looking for ideas on improving their own performance, so please provide a good summary of how you are going to accomplish your goal without going into an enormous amount of detail. A short paragraph should be sufficient.

# 2. ARE YOU PROPOSING THIS AS A CHALLENGE COMMITMENT?

EPA has selected one or more high priority environmental concerns in each EPA Region as the subject of a "Challenge Commitment." In order to encourage Performance Track members to make progress on these high priority environmental issues, a facility that makes a Challenge Commitment that meets EPA's requirements can get "two-for-one" credit, i.e., the facility can choose to make only two additional commitments, rather than three. However, a small facility that makes a Challenge Commitment would still have to make one additional commitment. For more details, please read EPA's Challenge Commitment Policy for the National Environmental Performance Track Program (PDF, 39 KB, 3 pp.).

Note that not all commitments can be considered Challenge Commitments. If the type of commitment you selected is not eligible to be a Challenge Commitment, the response to question 2 will be marked as "No," and it will not be possible to edit that response. If the type of commitment you selected is eligible to be a Challenge Commitment, click on the link "Learn more about Challenge Commitments" under question 2 to see what criteria your facility would need to meet in order to make a Challenge Commitment.

If you would like to know the types of commitments that could potentially be used as Challenge Commitments, you must first identify the EPA Region in which your facility is located. To find out your EPA Region, see the <u>EPA Regional map</u>. Then, to find out which Challenge Commitments are available in your Region, click on the link to your Region below. If the commitment you are making meets the requirements for a Challenge Commitment as described in the links below, answer "Yes" to question 2 on the Renewal form.

•	Region 1	•	Region 6
•	Region 2	•	Region 7
•	Region 3	•	Region 8
•	Region 4	•	Region 9
•	Region 5	•	Region 10

If your facility is eligible to make a Transportation Energy Use Challenge Commitment, you should be able to select "Yes" in response to question 2 on your renewal. Click on the link "Learn more about Challenge Commitments" under question 2 to see what criteria your facility would need to meet in order to make a Challenge Commitment. If the commitment you are making meets the requirements for a Challenge Commitment, answer "Yes" to question 2.

#### 3A. AND 3B. DOES THIS COMMITMENT ADDRESS A SIGNIFICANT ASPECT IN YOUR EMS?

During the planning phase of your EMS, you should have designated some of your environmental aspects as "significant." If this commitment addresses one of those significant aspects, check "Yes." Otherwise, check "No."

If you answered "No" in part a, under part b please explain why you believe the selected indicator should be included as a performance commitment. Significant aspects are usually those that pose the highest environmental risk, or are of particular local concern. In general, we expect Performance Track facilities to be working on these priorities first. If your commitment does not address a significant aspect, please explain why you think it is important.

# Goal of Transportation Energy Use commitment

In the drop-down menus above 4a, first please select whether you will be reporting on Required Transportation Energy Sources Only, Required and Optional Transportation Energy Sources, or Employee Commuting Only. In the second drop-down menu, please select whether your commitment is to Reduce Total Transportation Energy Use, Use Renewable Fuels, or a Combination of Both Strategies.

#### 4A. REPORTING YEARS

Performance Track has pre-filled the calendar years for which you should measure baseline and project future quantities of your indicator.

# 4B. REQUIRED REPORTING, BY FUEL TYPE

Complete the table by filling in quantities for transportation energy use byfuel type. Standard units for each fuel type will be filled in automatically in the far right column. If you measure your fuel usage in other units, please choose "Other" as the fuel type. Fill in the amount of fuel you

used during the "Baseline" calendar year in the "Baseline" column. Fill in the amount you are committing to use during the "Future" calendar year in the "Future" column.

### 4C. OPTIONAL REPORTING, BY CATEGORY AND FUEL TYPE

Complete the table by filling in quantities for transportation energy use by fuel type. Standard units for each fuel type will be filled in automatically in the far right column. If you measure your fuel usage in other units, please choose "Other" as the fuel type. Fill in the amount of fuel you used during the "Baseline" calendar year in the "Baseline" column. Fill in the amount you are committing to use during the "Future" calendar year in the "Future" column.

# Calculating Total Energy Use

Once you have entered all of your transportation energy use information, prompt the form to calculate your totals by either saving your work or hitting the "Calculate Total(s)" button. (Note that you can save your work at any time while you are filling in your data, to prevent losing information, but be sure to recalculate totals when you have completely finished.)

The table will automatically calculate Total Required Transportation Energy Use, Total Optional Transportation Energy Use, and Total Transportation Energy Use by summing the quantities of fuel you report in the table and converting to MMBtus.

# 5. DOES THE QUANTITY PRESENTED IN THE FUTURE QUANTITY COLUMN REPRESENT AN ABSOLUTE GOAL OR A NORMALIZED GOAL?

If the numerical goal that you entered in 4c is the absolute level that you intend to achieve, regardless of any changes in production, then you should check "Absolute Goal." If you intend for your goal to be evaluated relative (indexed) to the production levels in your baseline year, then you should check "Normalized Goal." (Most member facilities have normalized goals.) Note that Challenge Commitments to reduce Transportation Energy Use must be absolute goals.

#### 6. PLEASE BRIEFLY DESCRIBE YOUR INTENDED BASIS FOR NORMALIZING.

Environmental performance can be measured by the absolute amount of environmental impacts (the "environmental footprint"), or by the environmental impact relative to economic activity (also called "eco-efficiency"). A complete picture of a facility's environmental progress should include both measurements. Regardless of whether you have decided to commit to an absolute goal or to a normalized goal, in your Annual Performance Reports you will be asked to report your progress in both absolute and normalized terms.

A normalizing factor will allow this conversion between the absolute and relative impacts, while protecting the confidentiality of production levels, product content, or other sensitive information. The best normalizing factors are direct measures of production, for example, number of cars produced, kWh of electricity generated, dollars of sales adjusted for inflation. Depending on the facility, "production" may instead refer to services delivered or to some other productive output from the facility. Research, service, and governmental facilities may find it more difficult to determine their normalizing factors, and instead may have to rely on substitute measures of production, such as employment. If you need help determining the basis for your normalizing factor, please click on the "Normalizing Help Summary" link or refer to the Performance Track normalizing guidance.

If your facility or company has developed a production index that weighs heterogeneous types of products according to size, complexity, or other factors, you may use that as your normalizing factor. Please provide a brief description of the index. It is not necessary to provide the exact equation, but please do list or describe the types of factors included.

# 7A. AND 7B. ARE YOU SUBJECT TO FEDERAL, STATE, TRIBAL, OR LOCAL REGULATORY REQUIREMENTS FOR THIS INDICATOR?

If you have any regulatory requirements related to this indicator—even if they do not directly address quantitative limits—check "Yes." Otherwise, check "No."

If you answered "Yes" under 7a, please list those requirements, including the quantitative limits and compliance deadlines that apply to you in part 7b. Please also explain how your commitment exceeds these requirements. Performance Track needs this information to make sure that your commitment goes beyond compliance. Type in the regulation(s), compliance schedules, and quantitative limits that relate to the indicator. If the units used in the regulation are not the same as the units used in your commitment—for example, if the regulation states concentrations rather than mass—then explain how your commitment goes beyond the regulation. If the regulation does not address quantitative limits, state that here.

### COMMITMENTS TO REDUCE GREENHOUSE GAS EMISSIONS

# **Indicator Definition**

CATEGORY: AIR EMISSIONS

#### INDICATOR: TOTAL GHGs

Commitments to reduce greenhouse gas emissions (GHGs) must cover all GHGs emitted by the facility, including energy use, process-related emissions, and fugitive emissions. Facilities may list and subtract offsets (such as purchasing renewable energy credits) against their GHG impacts. To make a commitment to reduce GHGs, your facility should have conducted a baseline GHG inventory, and you should have carbon-equivalent estimates your facility's GHG impact from each GHG source.

If your greenhouse gas emission reduction activities will consist solely of reducing energy use, it may be easier for you to make a commitment in the energy use indicator rather than in the greenhouse gas emissions indicator. You may not make a commitment in both areas because of the likelihood of double counting energy use impacts.

For detailed guidance in filling out the greenhouse gas commitment form and/or calculating CO<sub>2</sub> equivalents, see the <u>Climate Leaders Greenhouse Gas Inventory Guidance Modules</u>.

**Units:** The units used for all greenhouse gas emissions sources and offsets are metric tons of carbon dioxide equivalents (MTCO<sub>2</sub>E).

# Section C Instructions

If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or <a href="mailto:ptrack@indecon.com">ptrack@indecon.com</a>.

### In this section:

1a. and 1b. Category and Indicator	8-2
1c. Please provide additional detail on your indicator	8-2
1d. What activities or process changes do you plan to undertake at your facility to accomplish your commitment?	8-2
2. Are you proposing this as a challenge commitment?	8-2
3a. and 3b. Does this commitment address a significant aspect in your EMS?	8-3
4a. Reporting Years	8-3
4b. Baseline and Future Quantities	8-3
Direct Emissions	8-4
Indirect Emissions	8-4

Metric Tons of CO <sub>2</sub> Equivalents Offset due to Investments in Green	
Energy	8-4
5. Does the quantity presented in the future quantity column represent an	
absolute goal or a normalized goal?	8-4
6. Please briefly describe your intended basis for normalizing.	8-5
7a. and 7b. Are you subject to federal, state, tribal, or local regulatory	
requirements for this indicator?	8-5

#### 1A. AND 1B. CATEGORY AND INDICATOR

These sections display the category and indicator you selected on the Membership Commitments Introduction page. In order to change this commitment, you must return to the main Membership Commitments Introduction page by clicking the "Sect.C Future" link at the top of the page. You may then delete this commitment by clicking the "delete" link adjacent to the entry for this commitment and add a new commitment in its place.

#### 1C. PLEASE PROVIDE ADDITIONAL DETAIL ON YOUR INDICATOR.

As noted in the <u>Environmental Performance Table</u>, for some indicators you have the choice of reporting on a specific subset of an indicator (e.g., one specific material or a particular group of air toxics). For commitments to Total GHGs, however, you must report on all greenhouse gas emissions, facility-wide. Therefore, "All" has already been selected for you.

# 1D. WHAT ACTIVITIES OR PROCESS CHANGES DO YOU PLAN TO UNDERTAKE AT YOUR FACILITY TO ACCOMPLISH YOUR COMMITMENT?

Describe the actions you will take to meet this commitment. You might include information like: process changes, equipment upgrades, product redesign, or shutting off equipment while not in use. This information might be used by other facilities looking for ideas on improving their own performance, so please provide a good summary of how you are going to accomplish your goal without going into an enormous amount of detail. A short paragraph should be sufficient.

# 2. ARE YOU PROPOSING THIS AS A CHALLENGE COMMITMENT?

EPA has selected one or more high priority environmental concerns in each EPA Region as the subject of a "Challenge Commitment." In order to encourage Performance Track members to make progress on these high priority environmental issues, a facility that makes a Challenge Commitment that meets EPA's requirements can get "two-for-one" credit, i.e., the facility can choose to make only two additional commitments, rather than three. However, a small facility that makes a Challenge Commitment would still have to make one additional commitment. For more details, please read EPA's Challenge Commitment Policy for the National Environmental Performance Track Program (PDF, 39 KB, 3 pp.).

Note that not all commitments can be considered Challenge Commitments. If the type of commitment you selected is not eligible to be a Challenge Commitment, the response to question 2 will be marked as "No," and it will not be possible to edit that response. If the type of commitment you selected is eligible to be a Challenge Commitment, click on the link "Learn more about Challenge Commitments" under question 2 to see what criteria your facility would need to meet in order to make a Challenge Commitment.

If you would like to know the types of commitments that could potentially be used as Challenge Commitments, you must first identify the EPA Region in which your facility is located. To find out your EPA Region, see the <u>EPA Regional map</u>. Then, to find out which Challenge Commitments are available in your Region, click on the link to your Region below. If the commitment you are making meets the requirements for a Challenge Commitment as described in the links below, answer "Yes" to question 2 on the Renewal form.

•	Region 1	•	Region 6
•	Region 2	•	Region 7
•	Region 3	•	Region 8
•	Region 4	•	Region 9
•	Region 5	•	Region 10

If your facility is eligible to make a GHG Challenge Commitment, you should be able to select "Yes" in response to question 2 on your renewal. Click on the link "Learn more about Challenge Commitments" under question 2 to see what criteria your facility would need to meet in order to make a Challenge Commitment. If the commitment you are making meets the requirements for a Challenge Commitment, answer "Yes" to question 2.

#### 3A. AND 3B. DOES THIS COMMITMENT ADDRESS A SIGNIFICANT ASPECT IN YOUR EMS?

During the planning phase of your EMS, you should have designated some of your environmental aspects as "significant." If this commitment addresses one of those significant aspects, check "Yes." Otherwise, check "No."

If you answered "No" in part a, under part b please explain why you believe the selected indicator should be included as a performance commitment. Significant aspects are usually those that pose the highest environmental risk, or are of particular local concern. In general, we expect Performance Track facilities to be working on these priorities first. If your commitment does not address a significant aspect, please explain why you think it is important.

#### 4A. REPORTING YEARS

Performance Track has pre-filled the calendar years for which you should measure baseline and project future quantities of your indicator.

#### 4B. BASELINE AND FUTURE QUANTITIES

For the "Baseline" quantity, specify the annual measurement of the indicator for the calendar year indicated in 4a. For the "Future" quantity, specify the annual amount that you are committed to achieve by the calendar year indicated in 4a. Assume that production is constant when setting the "Future" quantity in the commitment.

Note: If you are subject to regulatory limits for the quantity of this indicator, your future goal must indicate performance beyond what is required by those limits.

For GHG commitments, all emissions are reported in metric tons of carbon equivalents (MTCO $_2$ E), with the exception of electricity trading transactions, which can be reported in kWh.

The form for reporting on GHG commitments is separated into Direct Emissions, Indirect Emissions, and Offsets all of which are described below.

#### **Direct Emissions**

Direct emissions are emissions from your facility's operations that go directly into the air. For mobile sources, you only need to report emissions from on-site sources such as mobile equipment (e.g., forklifts) and on-site transportation sources (e.g., golf carts). You do not need to report on emissions from off-site activities, such as employee travel or commuting. If you want to report on emissions from off-site activities, report them under Optional Indirect Emissions. Under "Direct Emissions," fill in the measured quantities of emissions during the baseline year for each source type. Enter these emission quantities in the left column next to the source of the emission.

Fill in the annual quantities of emissions for each source that you are committing to achieve by the future year. Enter these emission quantities in the center column in the row corresponding to the source of the emission.

By saving your work or clicking the "Calculate Total(s)" button, the form will automatically calculate your Total Direct Emissions.

### **Indirect Emissions**

Indirect emissions occur away from your facility, but are caused by your facility's operations, for example, emissions that occur at an electrical generating plant as a result of your electricity purchases. Under "Indirect Emissions," fill in the measured quantities of emissions during the baseline year for each source type. Enter these emission quantities in the left column next to the source of the emission. If you have indirect sources of emissions that are not listed, type these sources into the "Other" fields below the listed sources. Enter emission quantities for these sources for the baseline year in the "Baseline" column.

Fill in the annual quantities that you are committing to achieve by the future year. Enter these quantities in the center column in the row corresponding to the source of the emission.

By saving your work or clicking the "Calculate Total(s)" button, the form will automatically calculate your Total Indirect Emissions.

# Metric Tons of CO<sub>2</sub> Equivalents Offset Due to Investments in Green Energy (e.g., "green tags")

Offsets are activities that may occur anywhere and result in a reduction of greenhouse gases in the atmosphere. Under this section, specify each source of offsets in the left column, and fill in the quantities measured during the baseline year and the quantity you are committing to achieve in the future year.

By saving your work or clicking the "Calculate Total(s)" button, the form will automatically calculate your Total Reduction in CO<sub>2</sub> Equivalents offset due to Investments in Green Energy, and your Total Emissions Less Offsets.

# 5. DOES THE QUANTITY PRESENTED IN THE FUTURE QUANTITY COLUMN REPRESENT AN ABSOLUTE GOAL OR A NORMALIZED GOAL?

If the numerical goal that you entered in 4b is the absolute level that you intend to achieve, regardless of any changes in production, then you should check "Absolute Goal." If you intend for your goal to be evaluated relative (indexed) to the production levels in your baseline year, then you should check "Normalized Goal." (Most member facilities have normalized goals.) Note that Challenge Commitments to reduce GHGs must be absolute goals.

#### 6. PLEASE BRIEFLY DESCRIBE YOUR INTENDED BASIS FOR NORMALIZING.

Environmental performance can be measured by the actual amount of environmental impacts (the "environmental footprint"), or by the environmental impact relative to economic activity (also called "eco-efficiency"). A complete picture of a facility's environmental progress should include both measurements. Regardless of whether you have decided to commit to an actual goal or to a normalized goal, in your Annual Performance Reports you will be asked to report your progress in both actual and normalized terms.

A normalizing factor will allow this conversion between the actual and relative impacts, while protecting the confidentiality of production levels, product content, or other sensitive information. The best normalizing factors are direct measures of production, for example, number of cars produced, kWh of electricity generated, dollars of sales adjusted for inflation. Depending on the facility, "production" may instead refer to services delivered or to some other productive output from the facility. Research, service, and governmental facilities may find it more difficult to determine their normalizing factors, and instead may have to rely on substitute measures of production, such as employment. If you need help determining the basis for your normalizing factor, please click on the "Normalizing Help Summary" link or refer to the Performance Track normalizing guidance.

If your facility or company has developed a production index that weighs heterogeneous types of products according to size, complexity, or other factors, you may use that as your normalizing factor. Please provide a brief description of the index. It is not necessary to provide the exact equation, but please do list or describe the types of factors included.

# 7A. AND 7B. ARE YOU SUBJECT TO FEDERAL, STATE, TRIBAL, OR LOCAL REGULATORY REQUIREMENTS FOR THIS INDICATOR?

If you have any regulatory requirements related to this indicator—even if they do not directly address quantitative limits—check "Yes." Otherwise, check "No."

If you answered "Yes" under 7a, please list those requirements, including the quantitative limits and compliance deadlines that apply to you in part 7b. Please also explain how your commitment exceeds these requirements. Performance Track needs this information to make sure that your commitment goes beyond compliance. Type in the regulation(s), compliance schedules, and quantitative limits that relate to the indicator. If the units used in the regulation are not the same as the units used in your commitment—for example, if the regulation states concentrations rather than mass—then explain how your commitment goes beyond the regulation. If the regulation does not address quantitative limits, state that here.

# COMMITMENTS TO REVITALIZE COMMUNITY LAND

# **Indicator Definition**

#### CATEGORY: LAND AND HABITAT

The indicators in the Land and Habitat category allow you to report on improvements in your facility's use and treatment of the land around your facility and in your community.

### INDICATOR: COMMUNITY LAND REVITALIZATION

The purpose of the Community Land Revitalization indicator is to recognize a facility's efforts to invest in brownfields cleanup projects in its local community. The focus of these projects is third-party investment in local land revitalization, so the brownfield site should not be owned by, or have been previously owned by, the facility. Prior to making this commitment, a facility must have already worked with a local agency to identify the site, determine the project and the intended outcomes, and arrange for the facility's participation. Further information about community land revitalization activities, methods for measuring environmental benefits, and otherwise completing the commitment form can be obtained by contacting the Performance Track Information Center at 1-888-339-7875 or at ptrack@indecon.com.

Units: Units for reporting Community Land Revitalization include square feet or acres.

# Section C Instructions

If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or <a href="mailto:ptrack@indecon.com">ptrack@indecon.com</a>.

# In this section:

1a. and 1b. Category and Indicator	9-2
1c. Please provide the location of the site to be revitalized	9-2
1d. Please describe the previous use(s) of the site and any known or potential environmental problems at the site.	9-2
1e. Please describe the scope, planned activities, and intended outcomes of the land revitalization project.	9-2
1f. What will your facility contribute to this project? Please be as specific as possible (e.g., level of monetary contributions, amount of staff time, type of technical assistance or equipment).	9-3
1g. Please describe the intended future (post-revitalization) use of the site and identify the new owner or prospective buyer.	9-3
1h. Please identify your community partner(s) in this project	9-3
1i. What organization(s) will manage the funds and revitalization activities?	9-3

1j. Please identify the state voluntary cleanup program or environmental	
professional that will certify the completion of the revitalization	
project	9-3
2. Are you proposing this as a regional challenge commitment?	9-3
3a. and 3b. Does this commitment address a significant aspect in your	
EMS?	9-3
4a. Reporting Years	9-4
4b. What is the size of the project site?	9-4
4c. Please describe the anticipated environmental benefits of this project.	
Be as specific as possible.	9-4
4d. (Optional) Please describe other benefits of this project	9-4
5. and 6	9-5
7a. and 7b. Are you subject to federal, state, tribal, or local regulatory	
requirements for this indicator?	9-5

#### 1A. AND 1B. CATEGORY AND INDICATOR

These sections display the category and indicator you selected on the Membership Commitments Introduction page. In order to change this commitment, you must return to the main Membership Commitments Introduction page by clicking the "Sect.C Future" link at the top of the page. You may then delete this commitment by clicking the "delete" link adjacent to the entry for this commitment and add a new commitment in its place.

### 1C. PLEASE PROVIDE THE LOCATION OF THE SITE TO BE REVITALIZED.

Indicate the physical location (not the mailing address) of the site that will be revitalized.

# 1D. PLEASE DESCRIBE THE PREVIOUS USE(S) OF THE SITE AND ANY KNOWN OR POTENTIAL ENVIRONMENTAL PROBLEMS AT THE SITE.

Provide a narrative description about the site. The description may include information regarding, but not limited to, the history of the site including past owners and past uses leading or contributing to environmental contamination and the types of media (i.e., soil, air, surface water, ground water, drinking water, sediments) that were impacted by the identified contaminants. List the contaminants of concern (e.g., VOCs, PAHs, metals, lead) and indicate the contaminants that are above applicable state and federal cleanup standards. Document that your facility is not liable for the contamination and has not owned the project site in the past. Indicate any specific past use(s) (e.g., textile mill, automotive manufacturing plant, shopping center) as well as the general category of past use(s) (e.g., industrial, commercial, residential, recreational, public purpose use, mixed-use).

# 1E. PLEASE DESCRIBE THE SCOPE, PLANNED ACTIVITIES, AND INTENDED OUTCOMES OF THE LAND REVITALIZATION PROJECT.

Provide a narrative description about the cleanup project and your facility's involvement. The description should include the scope of the commitment, planned activities to meet the

commitment, and the intended outcomes of the commitment. Also include the timeline and schedule of the project, and at what point(s) your facility will become involved.

# 1F. WHAT WILL YOUR FACILITY CONTRIBUTE TO THIS PROJECT? PLEASE BE AS SPECIFIC AS POSSIBLE (E.G., LEVEL OF MONETARY CONTRIBUTIONS, AMOUNT OF STAFF TIME, TYPE OF TECHNICAL ASSISTANCE OR EQUIPMENT).

Describe the contribution(s) your facility is making to the project.

### 1G. PLEASE DESCRIBE THE INTENDED FUTURE (POST-REVITALIZATION) USE OF THE SITE AND IDENTIFY THE NEW OWNER OR PROSPECTIVE BUYER.

Describe the intended use of the site after the revitalization project has been completed. The description should include, but is not limited to, the new or continued ownership entity and specific uses (e.g., park, wetlands, residential, community center, office/retail space).

### 1H. PLEASE IDENTIFY YOUR COMMUNITY PARTNER(S) IN THIS PROJECT.

List each community partner that is involved in the project. Community partners may include, but are not limited to, local government boards, county or regional planning commissions, local businesses, community-activism groups, social organizations, and religious groups.

#### 11. WHAT ORGANIZATION(S) WILL MANAGE THE FUNDS AND REVITALIZATION ACTIVITIES?

List the organization(s) that will be serving as the fund manager(s) for the revitalization project. If there is more than one, provide detail as to the parts of the project for which each organization is managing the funds (e.g., assessment, cleanup, demolition, site preparation, reuse planning, construction, associated public works improvements).

# 1J. PLEASE IDENTIFY THE STATE VOLUNTARY CLEANUP PROGRAM OR ENVIRONMENTAL PROFESSIONAL THAT WILL CERTIFY THE COMPLETION OF THE REVITALIZATION PROJECT.

Identify the name and contact information for the state program or environmental professional that will certify that the project has been completed to all applicable state cleanup standards and that all requirements of the state have been met.

#### 2. ARE YOU PROPOSING THIS AS A REGIONAL CHALLENGE COMMITMENT?

This question does not apply to community land revitalization commitments, and therefore the answer is pre-filled as "No."

#### 3A. AND 3B. DOES THIS COMMITMENT ADDRESS A SIGNIFICANT ASPECT IN YOUR EMS?

During the planning phase of your EMS, you should have designated some of your environmental aspects as "significant." If this commitment addresses one of those significant aspects, check "Yes." Otherwise, check "No."

If you answered "No" in part a, under part b please explain why you believe the selected indicator should be included as a performance commitment. Significant aspects are usually those that pose the highest environmental risk, or are of particular local concern. In general, we expect Performance Track facilities to be working on these priorities first. If your commitment does not address a significant aspect, please explain why you think it is important.

#### **4A. REPORTING YEARS**

Performance Track has pre-filled the calendar years for which you should measure baseline and project future quantities of your indicator.

#### 4B. WHAT IS THE SIZE OF THE PROJECT SITE?

Indicate the size of the project site and the units of measure you have used (the units of measure should be either acres or square feet).

### 4C. PLEASE DESCRIBE THE ANTICIPATED ENVIRONMENTAL BENEFITS OF THIS PROJECT. BE AS SPECIFIC AS POSSIBLE.

Describe the positive environmental outcomes expected as a result of project completion. Consider both environmental benefits that will be immediately apparent, as well as those that may become observable in the longer-term. Short-term environmental benefits include, but are not limited to:

- Volume of contaminated soils addressed, either removed from the property or treated on-site;
- Volume of contaminated ground water addressed by the remediation;
- Reduction in air emissions;
- Volume of contaminated sediments addressed;
- Reduced, or eliminated, exposures to the contaminants of concern;
- Green space restored and/or open space preserved; and
- Runoff and/or erosion eliminated.

Other environmental benefits may not occur until after the three-year participation period. However, these may be considered when responding to this question. Longer-term environmental benefits may include, but are not limited to:

- Improved stream protection and water quality (may include stream monitoring of stream characteristics such as channel stability, riparian zone width, and biodiversity – many communities have volunteer stream monitoring programs);
- Reduced air pollution (may depend on prior use);
- Reduced leaching to ground water (may depend on prior use);
- Use of sustainable building or green building practices (e.g., LEED or ENERGY STAR® certified); and
- Amount of energy, water, or other resource conserved as a result of the sustainable building or design practices.

#### 4D. (OPTIONAL) PLEASE DESCRIBE OTHER BENEFITS OF THIS PROJECT.

Describe any positive impacts of the project that have not been captured by previous questions. Examples include, but are not limited to:

- Number of jobs leveraged;
- Projected increases in the tax-base;
- Projected increase in local real estate values; and

Amount of existing infrastructure reused or improved.

#### 5. AND 6.

These questions do not apply to community land revitalization commitments.

# 7A. AND 7B. ARE YOU SUBJECT TO FEDERAL, STATE, TRIBAL, OR LOCAL REGULATORY REQUIREMENTS FOR THIS INDICATOR?

If you have any regulatory requirements related to this indicator—even if they do not directly address quantitative limits—check "Yes." Otherwise, check "No."

If you answered "Yes" under 7a, please list those requirements, including the quantitative limits and compliance deadlines that apply to you in part 7b. Please also explain how your commitment exceeds these requirements. We need this information to make sure that your commitment goes beyond compliance. Type in the regulation(s), compliance schedules, and quantitative limits that relate to the indicator. If the units used in the regulation are not the same as the units used in your commitment—for example, if the regulation states concentrations rather than mass—then explain how your commitment goes beyond the regulation. If the regulation does not address quantitative limits, state that here.

#### COMMITMENTS TO REDUCE NON-HAZARDOUS OR HAZARDOUS WASTE

### **Indicator Definition**

**CATEGORY: WASTE** 

#### INDICATOR: NON-HAZARDOUS WASTE

Non-hazardous waste includes any non-hazardous output (solid, semi-solid, or liquid) shipped off-site for treatment or disposal, excluding products and product packaging. Do not include in this indicator wastewater containing non-hazardous waste, non-hazardous waste resulting from product take-back initiatives, or non-hazardous waste resulting from community recycling programs. Non-hazardous waste that will be sold (not recycled) should be captured under the "Other management strategy." Any wastes that will be sold in order to be recycled should be classified under reused/recycled offsite. In addition, any non-hazardous non-product materials that are not shipped off site, but rather are recycled or stored onsite, are not considered waste for the purpose of the program unless or until they are sent off-site.

Universal wastes includes mercury-containing equipment and lamps, pesticides, and many types of batteries. Universal wastes should be reported as hazardous waste.

Batteries that are NOT universal waste, and therefore should be reported as non-hazardous waste, include lithium batteries, and cylindrical and rectangular alkaline and carbon zinc batteries (AA, AAA, C, D, 9V, etc.), as long as the alkaline and carbon zinc batteries are not labeled as containing mercury. Alkaline and carbon zinc batteries typically do not contain mercury, but any battery labeled as containing mercury should be reported as hazardous waste.

For more information on universal wastes, go to: http://www.epa.gov/epaoswer/hazwaste/id/univwast/basic.htm

Your non-hazardous waste commitment may be to reduce non-hazardous waste generation, to switch to an environmentally preferable management method, or both. EPA's waste management hierarchy does not consider combustion (incineration) to be environmentally preferable to landfilling. The management method of incinerating waste to generate energy should be characterized as "other management," and further specified as waste-to-energy. Waste-to-energy is considered to be preferable to straight incineration. If your commitment is to switch to an environmentally preferable management method, the total quantity of the non-hazardous waste must either remain the same or decrease in the future year. Activities that result in an increase in the line labeled "Total Non-hazardous Waste" will not be accepted as a commitment.

In addition, you may focus your commitment on all waste streams or a specific waste stream(s). Regardless of your activities, the quantities that you provide must account for facility-wide waste of the type reported.

**Units:** Acceptable units for non-hazardous waste commitments are pounds and tons.

#### INDICATOR: HAZARDOUS WASTE

Hazardous waste includes any hazardous non-product output (solid, semi-solid, or liquid) that the facility generates and treats on-site or ships off-site for treatment or disposal, excluding any waste generated as a service to the community. Do not include wastewater containing hazardous waste, hazardous waste resulting from product take-back initiatives, or hazardous waste resulting from community recycling programs. Non-hazardous waste that will be sold (not for recycling) should be captured under the "Other management strategy." Any wastes that will be sold in order to be recycled should be classified under reused/recycled offsite.

Universal wastes includes mercury-containing equipment and lamps, pesticides, and many types of batteries. Universal wastes should be reported as hazardous waste.

Batteries that are universal waste include:

- Batteries containing lead or "lead-acid," such as car batteries
- Ni-Cad batteries, because they contain cadmium
- Batteries containing mercury, which include button cell batteries

Batteries that are NOT universal waste, and therefore should be reported as non-hazardous waste, include lithium batteries, and cylindrical and rectangular alkaline and carbon zinc batteries (AA, AAA, C, D, 9V, etc.), as long as the alkaline and carbon zinc batteries are not labeled as containing mercury. Alkaline and carbon zinc batteries typically do not contain mercury, but any battery labeled as containing mercury should be reported as hazardous waste.

For more information on universal wastes, go to: http://www.epa.gov/epaoswer/hazwaste/id/univwast/basic.htm

Your hazardous waste commitment may be to reduce hazardous waste generation, to switch to an environmentally preferable management method, or both. EPA's waste management hierarchy does not consider combustion (incineration) to be environmentally preferable to landfilling. The management method of incinerating waste to generate energy should be characterized as "other management," and further specified as waste-to-energy. Waste-to-energy is considered to be preferable to straight incineration. If your commitment is to switch to an environmentally preferable management method, the total quantity of the hazardous waste must either remain the same or decrease in the future year. Activities that result in an increase in the line labeled "Total Hazardous Waste" will not be accepted as a commitment.

In addition, you may focus your commitment on all waste streams or a specific waste stream(s). Regardless of your activities, the quantities that you provide must account for facility-wide waste of the type reported.

Units: Acceptable units for hazardous waste commitments are pounds and tons.

### Section C Instructions

If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or ptrack@indecon.com.

#### In this section:

1a. and 1b. Category and Indicator	10-3
1c. Please provide additional detail on your indicator	10-3
1d. What activities or process changes do you plan to undertake at your	
facility to accomplish your commitment?	10-4
2. Are you proposing this as a challenge commitment?	10-4
3a. and 3b. Does this commitment address a significant aspect in your	
EMS?	10-4
Goal of Non-hazardous or Hazardous Waste Commitment	10-4
4a. Reporting Years	10-4
4b. Baseline and Future Quantities	10-4
5. Does the quantity presented in the future quantity column represent an	
absolute goal or a normalized goal?	10-5
6. Please briefly describe your intended basis for normalizing	10-5
7a. and 7b. Are you subject to federal, state, tribal, or local regulatory	
requirements for this indicator?	10-6

#### 1A. AND 1B. CATEGORY AND INDICATOR

These sections display the category and indicator you selected on the Membership Commitments Introduction page. In order to change this commitment, you must return to the main Membership Commitments Introduction page by clicking the "Sect.C Future" link at the top of the page. You may then delete this commitment by clicking the "delete" link adjacent to the entry for this commitment and add a new commitment in its place.

#### 1C. PLEASE PROVIDE ADDITIONAL DETAIL ON YOUR INDICATOR.

As noted in the <u>Environmental Performance Table</u>, for some indicators you have the choice of reporting on a specific subset of an indicator (e.g., one specific material or a particular group of air toxics). If the indicator that you have chosen does not offer this option, then the "All" button will be automatically selected for you. If the indicator that you have chosen does offer this option, then please indicate whether your measurement reflects the total indicator (check "All") or a particular element (check "Specific").

Important: A distinction should be made between "total" amounts ("all") and "facility-wide" ("entire facility"). "Total" and "all" refer to the environmental indicator. For example, "total materials use" refers to all materials used at a facility, as opposed to a specific material (paper, lead, etc.) or subset (e.g., oil-based paints). "Facility-wide" and "entire facility" refer to the scope of the measurement. Every commitment should be facility-wide, i.e., each commitment should represent the performance level for the indicator across the entire facility. Measurements should

not show performance at process-, product-, or building-specific levels, unless the selected indicator is only used or generated in that specific area.

If you selected "specific", please type in a short description of your indicator (for example, a chemical name).

# 1D. WHAT ACTIVITIES OR PROCESS CHANGES DO YOU PLAN TO UNDERTAKE AT YOUR FACILITY TO ACCOMPLISH YOUR COMMITMENT?

Describe the actions you will take to meet this commitment. You might include information like: process changes, equipment upgrades, product redesign, or shutting off equipment while not in use. This information might be used by other facilities looking for ideas on improving their own performance, so please provide a good summary of how you are going to accomplish your goal without going into an enormous amount of detail. A short paragraph should be sufficient.

#### 2. ARE YOU PROPOSING THIS AS A CHALLENGE COMMITMENT?

This option is not currently available for waste commitments, and therefore the answer is prefilled as "No."

#### 3A. AND 3B. DOES THIS COMMITMENT ADDRESS A SIGNIFICANT ASPECT IN YOUR EMS?

During the planning phase of your EMS, you should have designated some of your environmental aspects as "significant." If this commitment addresses one of those significant aspects, check "Yes." Otherwise, check "No."

If you answered "No" in part a, under part b please explain why you believe the selected indicator should be included as a performance commitment. Significant aspects are usually those that pose the highest environmental risk, or are of particular local concern. In general, we expect Performance Track facilities to be working on these priorities first. If your commitment does not address a significant aspect, please explain why you think it is important.

#### Goal of Non-hazardous or Hazardous Waste Commitment

In the box above 4a, please select whether your commitment is to reduce waste, to improve methods of waste management, or a combination of both.

#### **4A. REPORTING YEARS**

Performance Track has pre-filled the calendar years for which you should measure baseline and project future quantities of your indicator.

#### **4B. BASELINE AND FUTURE QUANTITIES**

For the first line of the table, in the far left column choose one of the management methods that you use for non-hazardous or hazardous waste you are committing to reduce from the pull-down menu. Move to the next cell to the right, and enter the quantity of waste that you managed with this method in the baseline year. Move another cell to the right, and enter the quantity of waste that you are committing to manage with this method in the future year. Choose the units you use for these quantities from the pull-down menu in the Units column. You must use one of the units from the pull-down menu.

Move to the second line, left column of the table, and choose another management method that you use for non-hazardous or hazardous waste, and repeat the same process as above. Continue choosing management methods until you have listed all the methods you have used or will use for the waste.

#### **Automatic Calculations**

By saving your work or clicking the "Calculate Total(s)" button, the form will automatically calculate the total non-hazardous or hazardous waste you are committing to reduce across all management methods. This total for the future year must be less than or equal to the total for the baseline year. (If the total amounts are the equal in the baseline and future years, your goal should be to improve your facility's waste management methods, e.g., by reusing and/or recycling more waste and landfilling and/or incinerating less waste).

# 5. DOES THE QUANTITY PRESENTED IN THE FUTURE QUANTITY COLUMN REPRESENT AN ABSOLUTE GOAL OR A NORMALIZED GOAL?

If the numerical goal that you entered in 4b is the absolute level that you intend to achieve, regardless of any changes in production, then you should check "Absolute Goal." If you intend for your goal to be evaluated relative (indexed) to the production levels in your baseline year, then you should check "Normalized Goal." (Most member facilities have normalized goals.)

#### 6. PLEASE BRIEFLY DESCRIBE YOUR INTENDED BASIS FOR NORMALIZING.

Environmental performance can be measured by the actual amount of environmental impacts (the "environmental footprint"), or by the environmental impact relative to economic activity (also called "eco-efficiency"). A complete picture of a facility's environmental progress should include both measurements. Regardless of whether you have decided to commit to an actual goal or to a normalized goal, in your Annual Performance Reports you will be asked to report your progress in both actual and normalized terms.

A normalizing factor will allow this conversion between the actual and relative impacts, while protecting the confidentiality of production levels, product content, or other sensitive information. The best normalizing factors are direct measures of production, for example, number of cars produced, kWh of electricity generated, dollars of sales adjusted for inflation. Depending on the facility, "production" may instead refer to services delivered or to some other productive output from the facility. Research, service, and governmental facilities may find it more difficult to determine their normalizing factors, and instead may have to rely on substitute measures of production, such as employment. If you need help determining the basis for your normalizing factor, please click on the "Normalizing Help Summary" link or refer to the Performance Track normalizing guidance.

If your facility or company has developed a production index that weighs heterogeneous types of products according to size, complexity, or other factors, you may use that as your normalizing factor. Please provide a brief description of the index. It is not necessary to provide the exact equation, but please do list or describe the types of factors included.

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# 7A. AND 7B. ARE YOU SUBJECT TO FEDERAL, STATE, TRIBAL, OR LOCAL REGULATORY REQUIREMENTS FOR THIS INDICATOR?

If you have any regulatory requirements related to this indicator—even if they do not directly address quantitative limits—check "Yes." Otherwise, check "No."

If you answered "Yes" under 7a, please list those requirements, including the quantitative limits and compliance deadlines that apply to you in part 7b. Please also explain how your commitment exceeds these requirements. Performance Track needs this information to make sure that your commitment goes beyond compliance. Type in the regulation(s), compliance schedules, and quantitative limits that relate to the indicator. If the units used in the regulation are not the same as the units used in your commitment—for example, if the regulation states concentrations rather than mass—then explain how your commitment goes beyond the regulation. If the regulation does not address quantitative limits, state that here.

#### GENERAL SECTION C: COMMITMENT INSTRUCTIONS

In this section, please provide details on your facility's new environmental performance commitments. To the extent possible, EPA will automatically calculate quantities in the commitment tables based upon information you provide. If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or <a href="mailto:ptrack@indecon.com">ptrack@indecon.com</a>.

#### In this section:

1a. and 1b. Category and Indicator	11-1
1c. Please provide additional detail on your indicator	11-1
1d. What activities or process changes do you plan to undertake at your facility to accomplish your commitment?	11-2
2. Are you proposing this as a challenge commitment?	11-2
3a. and 3b. Does this commitment address a significant aspect in your EMS?	11-3
4a. Reporting Years	11-3
4b. and 4c. Units and baseline and future quantities	11-3
5. Does the quantity presented in the future quantity column represent an absolute goal or a normalized goal?	11-3
6. Please briefly describe your intended basis for normalizing	11-3
7a. and 7b. Are you subject to federal, state, tribal, or local regulatory requirements for this indicator?	11-4

#### 1A. AND 1B. CATEGORY AND INDICATOR

These sections display the category and indicator you selected on the Membership Commitments Introduction page. To change either the commitment or indicator for standard form commitments, click the "Change Commitment" button.

#### 1C. PLEASE PROVIDE ADDITIONAL DETAIL ON YOUR INDICATOR.

As noted in the Environmental Performance Table, for some indicators you have the choice of reporting on a specific subset of an indicator (e.g., one specific material or a particular group of air toxics). If the indicator that you have chosen does not offer this option, then the "All" button will be automatically selected for you. If the indicator that you have chosen does offer this option, then please indicate whether your measurement reflects the total indicator (check "All") or a particular element (check "Specific").

Important: A distinction should be made between "total" amounts ("all") and "facility-wide" ("entire facility"). "Total" and "all" refer to the environmental indicator. For example, "total materials use" refers to all materials used at a facility, as opposed to a specific material (paper, lead, etc.) or subset (e.g., oil-based paints). "Facility-wide" and "entire facility" refer to the scope of the measurement. Every commitment should be facility-wide, i.e., each commitment should

represent the performance level for the indicator across the entire facility. Measurements should not show performance at process-, product-, or building-specific levels, unless the selected indicator is only used or generated in that specific area.

If you selected "specific," please type in a short description of your indicator (for example, a chemical name).

# 1D. WHAT ACTIVITIES OR PROCESS CHANGES DO YOU PLAN TO UNDERTAKE AT YOUR FACILITY TO ACCOMPLISH YOUR COMMITMENT?

Describe the actions you will take to meet this commitment. You might include information like: process changes, equipment upgrades, product redesign, or shutting off equipment while not in use. This information might be used by other facilities looking for ideas on improving their own performance, so please provide a good summary of how you are going to accomplish your goal without going into an enormous amount of detail. A short paragraph should be sufficient.

#### 2. ARE YOU PROPOSING THIS AS A CHALLENGE COMMITMENT?

EPA has selected one or more high priority environmental concerns in each EPA Region as the subject of a "Challenge Commitment." In order to encourage Performance Track members to make progress on these high priority environmental issues, a facility that makes a Challenge Commitment that meets EPA's requirements can get "two-for-one" credit, i.e., the facility can choose to make only two additional commitments, rather than three. However, a small facility that makes a Challenge Commitment would still have to make one additional commitment. For more details, please read EPA's Challenge Commitment Policy for the National Environmental Performance Track Program (PDF, 39 KB, 3 pp.).

Note that not all commitments can be considered Challenge Commitments. If the type of commitment you selected is not eligible to be a Challenge Commitment, the response to question 2 will be marked as "No," and it will not be possible to edit that response. If the type of commitment you selected is eligible to be a Challenge Commitment, click on the link "Learn more about Challenge Commitments" under question 2 to see what criteria your facility would need to meet in order to make a Challenge Commitment.

If you would like to know the types of commitments that could potentially be used as Challenge Commitments, you must first identify the EPA Region in which your facility is located. To find out your EPA Region, see the EPA Regional map. Then, to find out which Challenge Commitments are available in your Region, click on the link to your Region below. If the commitment you are making meets the requirements for a Challenge Commitment as described in the links below, answer "Yes" to question 2 on the Renewal form.

- Region 1
- Region 2
- Region 3
- Region 4
- Region 5

- Region 6
- Region 7
- Region 8
- Region 9
- Region 10

#### 3A. AND 3B. DOES THIS COMMITMENT ADDRESS A SIGNIFICANT ASPECT IN YOUR EMS?

During the planning phase of your EMS, you should have designated some of your environmental aspects as "significant." If this commitment addresses one of those significant aspects, check "Yes." Otherwise, check "No."

If you answered "No" in part a, under part b please explain why you believe the selected indicator should be included as a performance commitment. Significant aspects are usually those that pose the highest environmental risk, or are of particular local concern. In general, we expect Performance Track facilities to be working on these priorities first. If your commitment does not address a significant aspect, please explain why you think it is important.

#### **4A. REPORTING YEARS**

Performance Track has pre-filled the calendar years for which you should measure baseline and project future quantities of your indicator.

#### 4B. AND 4C. UNITS AND BASELINE AND FUTURE QUANTITIES

Choose from the drop-down menu the units you are using to measure your indicator. You must use units included in the menu.

For the "Baseline" quantity, specify the annual measurement of the indicator for the calendar year indicated in 4a. For the "Future" quantity, specify the annual amount that you are committed to achieve by the calendar year indicated in 4a. Assume that production is constant when setting the "Future" quantity in the commitment.

Note: If you are subject to regulatory limits for the quantity of this indicator, your future goal must indicate performance beyond what is required by those limits.

# 5. DOES THE QUANTITY PRESENTED IN THE FUTURE QUANTITY COLUMN REPRESENT AN ABSOLUTE GOAL OR A NORMALIZED GOAL?

If the numerical goal that you entered in 4c is the absolute level that you intend to achieve, regardless of any changes in production, then you should check "Absolute Goal." If you intend for your goal to be evaluated relative (indexed) to the production levels in your baseline year, then you should check "Normalized Goal." (Most member facilities have normalized goals.)

#### 6. PLEASE BRIEFLY DESCRIBE YOUR INTENDED BASIS FOR NORMALIZING.

Environmental performance can be measured by the actual amount of environmental impacts (the "environmental footprint"), or by the environmental impact relative to economic activity (also called "eco-efficiency"). A complete picture of a facility's environmental progress should include both measurements. Regardless of whether you have decided to commit to an actual goal or to a

normalized goal, in your Annual Performance Reports you will be asked to report your progress in both actual and normalized terms.

A normalizing factor will allow this conversion between the actual and relative impacts, while protecting the confidentiality of production levels, product content, or other sensitive information. The best normalizing factors are direct measures of production, for example, number of cars produced, kWh of electricity generated, dollars of sales adjusted for inflation. Depending on the facility, "production" may instead refer to services delivered or to some other productive output from the facility. Research, service, and governmental facilities may find it more difficult to determine their normalizing factors, and instead may have to rely on substitute measures of production, such as employment. If you need help determining the basis for your normalizing factor, please click on the "Normalizing Help Summary" link or refer to the <a href="Performance Track normalizing guidance">Performance Track normalizing guidance</a>.

If your facility or company has developed a production index that weighs heterogeneous types of products according to size, complexity, or other factors, you may use that as your normalizing factor. Please provide a brief description of the index. It is not necessary to provide the exact equation, but please do list or describe the types of factors included.

# 7A. AND 7B. ARE YOU SUBJECT TO FEDERAL, STATE, TRIBAL, OR LOCAL REGULATORY REQUIREMENTS FOR THIS INDICATOR?

If you have any regulatory requirements related to this indicator—even if they do not directly address quantitative limits—check "Yes." Otherwise, check "No."

If you answered "Yes" under 7a, please list those requirements, including the quantitative limits and compliance deadlines that apply to you in part 7b. Please also explain how your commitment exceeds these requirements. Performance Track needs this information to make sure that your commitment goes beyond compliance. Type in the regulation(s), compliance schedules, and quantitative limits that relate to the indicator. If the units used in the regulation are not the same as the units used in your commitment—for example, if the regulation states concentrations rather than mass—then explain how your commitment goes beyond the regulation. If the regulation does not address quantitative limits, state that here.

#### SECTION D INSTRUCTIONS

In this section, tell us about your commitment to public outreach.

If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or ptrack@indecon.com.

#### In this section:

1. How do you identify and respond to community concerns?	12-1
2. How do you inform community members of important matters that affect them?	12-1
3. How will you make the Performance Track Annual Performance Report available to the public?	12-1
4. Are there any ongoing citizen suits related to environmental issues against your facility?	12-1
5. List references below	12-2
Representative of a community/citizen group	12-2
State/tribal/local regulator	12-2
Other community/local reference (e.g., emergency management official or business associate)	12-2

#### 1. HOW DO YOU IDENTIFY AND RESPOND TO COMMUNITY CONCERNS?

Briefly describe how you identify and respond to community concerns. (For example, "We hold an open house every six months to discuss issues with the community," or "We have an employee who takes calls from community members.")

### 2. HOW DO YOU INFORM COMMUNITY MEMBERS OF IMPORTANT MATTERS THAT AFFECT THEM?

Briefly describe how you inform community members of important matters. (For example, "We send out a monthly newsletter detailing important issues.")

### 3. HOW WILL YOU MAKE THE PERFORMANCE TRACK ANNUAL PERFORMANCE REPORT AVAILABLE TO THE PUBLIC?

Tell us the way(s) that you will most likely distribute your Annual Performance Report by selecting one or more of the boxes. If you will be using a website, provide the URL. If "Other," please describe what will be done.

### 4. ARE THERE ANY ONGOING CITIZEN SUITS RELATED TO ENVIRONMENTAL ISSUES AGAINST YOUR FACILITY?

For the purposes of this question, we are referring to suits relating to environmental issues only. If there are any ongoing environmental citizen suits or other legal actions, select "Yes" and briefly describe their current status. Otherwise, select "No."

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#### 5. LIST REFERENCES BELOW.

We may call references to learn more about your facility. Enter the name of the person, the organization that the person represents, and telephone number. A person who is associated with your facility and who is also a member of a community/citizen group cannot be used as a reference. List at least one contact in each of the categories.

#### Representative of a community/citizen group

Name a person representing a community/citizen group based in your facility's community. Examples include civic groups, neighborhood associations, local chapters of environmental groups, and community development organizations. Consider choosing a reference from a community/citizen group that is familiar with your facility either through proximity (e.g., a group representing an adjacent neighborhood) or other involvement with the facility (e.g., a group with representation on a facility's community advisory committee).

#### State/tribal/local regulator

Name a person who is a regulator familiar with your facility. This person does not have to be associated with an environmental regulatory agency or department. For example, other appropriate regulatory agencies include those associated with public health or housing.

### Other community/local reference (e.g., emergency management official or business associate)

Name a person who is either an additional reference from one of the two categories above or a reference familiar with your facility and who represents another type of organization in the community. Potential references include a member of the Local Emergency Planning Committee (LEPC), a local labor union member, a representative from the local Chamber of Commerce, a university faculty member, or another business owner or operator.

#### **SECTION E INSTRUCTIONS**

The primary purposes of this section are for the facility to certify that the information reported in the application is true, accurate, and complete, and that the facility continues to adhere to all the criteria for participation in the National Environmental Performance Track program.

The person who signs the form must a) be the senior manager with responsibility for the facility, b) be fully authorized to execute the statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program, and c) have examined and be familiar with the information contained in the application. Once the rest of the application is completed, this person should read Section E in its entirety, ensure that each of the lines at the bottom of the page is completed (i.e. printed name, title, phone number, e-mail address, facility name, facility street address, alternative mailing address if appropriate, and Performance Track Identification Number), and sign and date the form in the space provided. All information, except for the alternate mailing address, is required. Completed forms should be faxed to the Performance Track Information Center at (617)-354-0463.

If you need further assistance, please contact the Performance Track Information Center at 1-888-339-PTRK or <a href="mailto:ptrack@indecon.com">ptrack@indecon.com</a>.

### **ENVIRONMENTAL REQUIREMENTS CHECKLIST INSTRUCTIONS**

Select all the requirements that apply to you. The Checklist is not intended to be an exhaustive list, but rather a reference to a number of major federal, state, tribal, and local requirements that are applicable to a wide range of facilities. If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or <a href="mailto:ptrack@indecon.com">ptrack@indecon.com</a>.